

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JEANNETTE FULLER HAUSLER as
Successor Personal Representative
of the Estate of ROBERT OTIS FULLER,
("BOBBY FULLER"), *Deceased*, on behalf
of THOMAS CASKEY as Personal
Representative of the Estate of LYNITA
FULLER CASKEY, surviving daughter
of ROBERT OTIS FULLER, The
ESTATE OF ROBERT OTIS FULLER,
FREDERICK FULLER, FRANCIS
FULLER, GRACE LUTES, JEANNETTE
FULLER HAUSLER, and IRENE MOSS,

Petitioner,

- against -

JP MORGAN CHASE BANK, N.A.,
CITIBANK, N.A., UBS AG, THE ROYAL
BANK OF SCOTLAND N.V.
(FORMERLY KNOWN AS ABN AMRO,
N.V.), BANK OF AMERICA, N.A., and
NATIONAL BANK OF CANADA,

Garnishee-Respondents.

JPMORGAN CHASE BANK, N.A.,
CITIBANK, N.A., UBS AG, THE ROYAL BANK
OF SCOTLAND N.V. (FORMERLY KNOWN AS
ABN AMRO BANK N.V.), and BANK OF
AMERICA, NATIONAL ASSOCIATION,

Garnishee-Respondent
and Third-Party Petitioner,

- against -

BANCO FINANCIERO INTERNACIONAL S.A.,
BANCO INTERNACIONAL DE COMERCIO,
S.A., BANCO NACIONAL DE CUBA, BANCO
POPULAR DE AHORRO, ABBOTT

09 Civ. 10289 (VM)

(Related to the JPMChase/Citibank
Turnover Proceeding -- Tranche I)

**NOTICE OF MOTION FOR
JUDGMENT ON PLEADINGS
CONCERNING CITIBANK'S
INTERPLEADER PETITION
AND FOR TURNOVER ORDER**

RE: Fidel Castro Ruz, Raul Castro
Ruz, The Republic of Cuba, and
The Cuban Revolutionary Armed
Forces

[JUDGMENT DEBTORS]]


LABORATORIES, INC., as successor to Quimica)
 Knoll de Mexico, S.A. de C.V., AEROFLOT)
 LINEAS AEREAS SOVIETICAS, ALBET)
 INGENIERA Y SISTEMAS, BANCO BILBAO)
 VIZCAYA ARGENTINA, S.A., BANCO)
 BILBAO VIZCAYA ARGENTINA PANAMA,)
 S.A., as successor to Banco Exterior Panama, S.A.,)
 BANCO DE CREDITO DEL PERU, as successor)
 to Financiera Nacional S.A., BANCO DE)
 ESPANA, BANCO ESPANOL DE CREDITO,)
 BANCO MONEX S.A., BANCO NACIONAL)
 DE MEXICO, S.A., BANCO PAULISTA S.A.,)
 BNP PARIBAS, BNP PARIBAS ESPANA, S.A.,)
 BANCO SANTANDER S.A., BANCO)
 SANTANDER TOTTA, S.A., as successor to)
 Banco Totta & Acores S.A., CAJA DE AHORROS)
 Y MONTE DE PIEDAD DE MADRID, CASA DE)
 CAMBIO MONEX, S.A., CREDIT SUISSE)
 GROUP AG, as successor to Swiss American)
 Securities, DRESDNER LATEINAMERIKA A.G.,)
 as successor to Dresdner Bank Lateinamerika A.G.,)
 ESTUDIOS MERCADOS Y SUMINISTROS S.L.,)
 GREEN DOWA HOLLAND BV, HSBC)
 TRINKAUS & BURKHARDT AG, ING BANK)
 N.V., INSTITUTO DE CARDIOLOGIA Y)
 CIRUGIA CARDIOVASCULAR CUBA,)
 INTERNATIONAL HANDLERS, INC., JSC)
 ZARUBEZHTSVETMET, LTU)
 LUFTRANSPORT-UNTERNEHMEN GMBH,)
 NOVAFIN FINANCIERE S.A., PETROLEOS DE)
 VENEZUELA S.A., PHILIPS MEXICANA S.A.)
 DE C.V., PREMUDA S.P.A., SANPAOLO)
 BANK S.A., SELECMAR SHIP MANAGEMENT,)
 TUI UK LTD., as successor to Britannia Airways)
 Ltd., TRYG FORSIKRING, as successor to)
 Baltica Bank and Baltica Forsikring, UNION)
 BANCAIRE PRIVEE, VITOL ENERGY)
 (BERMUDA) LTD and JEANNETTE FULLER)
 HAUSLER as Successor Personal Representative)
 of the Estate of ROBERT OTIS FULLER)
 ("BOBBY FULLER"), Deceased, on behalf of)
 THOMAS CASKEY as Personal Representative)
 of the Estate of LYNITA FULLER CASKEY,)
 surviving daughter of ROBERT OTIS FULLER,)
 THE ESTATE OF ROBERT OTIS FULLER,)
 FREDERICK FULLER, FRANCIS FULLER,)

GRACE LUTES, JEANNETTE FULLER)
HAUSLER, and IRENE MOSS,)
)
Adverse Claimants-)
Respondents.)
)

PLEASE TAKE NOTICE that upon the Turnover Petition dated April 21, 2010, the annexed Declaration of James W. Perkins dated April 15, 2011, the exhibits annexed thereto, the accompanying Memorandum of Law in Support, and upon all other papers and prior proceedings had herein, Petitioner Jeannette Hausler will move this Court before the Honorable Victor Marrero, at the United States Courthouse located at 500 Pearl Street, Courtroom 20B, New York, NY 10007-1312, at a date and time to be determined by the Court, for a judgment in her favor: (1) pursuant to Fed. R. Civ. P. 12(c) on the pleadings filed in connection with Citibank, N.A.'s Joint Third-Party Petition Alleging Claims in the Nature of Interpleader dated April 21, 2010; (2) granting turnover pursuant to Fed. Rules Civ. P. 56 and 69 and CPLR 5225(b) and (c) of the funds in the blocked accounts that are the subject of this proceeding; and (3) for such other and further relief as the Court deems to be appropriate and just.

Dated: New York, New York
April 15, 2011

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By: 
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